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8 IN THE UNITED STATES DISTRICT COURT
9 EASTERN DISTRICT OF CALIFORNIA
10

11 UNITED STATES OF AMERICA,
12 Plaintiff,
13 v.
14 MARQUIS ASAAD HOOPER and
NATASHA RENEE CHALK
15 Defendants.
16

CASE NO. 1:21-CR-00024-NONE-SKO

**STIPULATION BETWEEN THE PARTIES
REGARDING PROTECTED INFORMATION**

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18 WHEREAS, the discovery in this case contains a large amount of personal information including
19 but not limited to, confidential communications between members of the Navy, numerous individuals'
20 personal identifying information—including names, addresses, social security numbers, and phone
21 numbers—, various individuals' financial information including bank statements, and other nonpublic
22 documents ("Protected Information"); and
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24 WHEREAS, the parties desire to avoid both the necessity of large scale redactions and the
25 unauthorized disclosure or dissemination of this information to anyone not a party to the court
26 proceedings in this matter;

27 The parties agree that entry of a stipulated protective order is appropriate.
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1 THEREFORE, defendants MARQUIS ASAAD HOOPER and NATASHA RENEE CHALK, by
2 and through their counsels of record (“Defense Counsels”), and plaintiff the UNITED STATES, by and
3 through its counsel of record, hereby agree and stipulate as follows:

4 1. This Court may enter a protective order pursuant to Rule 16(d) of the Federal Rules of
5 Criminal Procedure, and its general supervisory authority.

6 2. This Order pertains to all discovery provided to or made available to either Defense
7 Counsel as part of discovery in this case (hereafter, collectively known as “the discovery”).

8 3. By signing this Stipulation, each Defense Counsel agrees not to share any documents that
9 contain Protected Information with anyone other than Defense Counsel and designated defense
10 investigators and support staff. Each Defense Counsel may permit the defendant to view unredacted
11 documents in the presence of their attorneys, defense investigators, and support staff. The parties agree
12 that each Defense Counsel, defense investigators, and support staff shall not allow the defendants to
13 copy Protected Information contained in the discovery. The parties agree that each Defense Counsel,
14 defense investigators, and support staff may provide the defendants with copies of documents from
15 which Protected Information has been redacted.

16 4. The discovery and information therein may be used only in connection with the litigation
17 of this case and for no other purpose. The discovery is now and will forever remain the property of the
18 Government. Each Defense Counsel will return the discovery to the Government or certify that it has
19 been destroyed at the conclusion of the case.

20 5. Each Defense Counsel will store the discovery in a secure place and will use reasonable
21 care to ensure that it is not disclosed to third persons in violation of this agreement.

22 6. Each Defense Counsel shall be responsible for advising the defendant, as well as each
23 Defense Counsel’s employees, other members of the defense team, and defense witnesses, of the
24 contents of this Stipulation and Order.
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7. In the event that either defendant substitutes counsel, that defendant's Defense Counsel agrees to withhold discovery from any new counsel unless and until substituted counsel agrees also to be bound by this Stipulation and Order.

IT IS SO STIPULATED.

DATED: February 8, 2021

/s/ Michael McKneely
MICHAEL MCKNEELY
COUNSEL FOR MARQUIS ASAAD HOOPER

/s/ Benjaim Gerson
BENJAMIN GERSON
COUNSEL FOR NATASHA RENEE CHALK

/s/ Vincente A. Tennerelli
VINCENTE A. TENNERELLI
COUNSEL FOR UNITED STATES

ORDER

IT IS SO ORDERED.

Dated: February 9, 2021

/s/ Sheila K. Oberto
UNITED STATES MAGISTRATE JUDGE